## IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No. 19-70166-JAD

Richard L. Nisewonger, Sr. : Chapter 13

Michelle A. Nisewonger : Document No. 58

Freedom Mortgage Corporation : Related to

Movant : Document No. doc

v. : Claim No. 13

Richard L. Nisewonger, Sr. Michelle A. Nisewonger

and

Ronda J. Winnecour, Esq. (Trustee) :

Resondents

## **DECLARATION OF ATTORNEY**

I, Theresa C. Homady, Esquire, counsel for the above captioned Debtor, hereby declare that I have reviewed the **Mortgage Analysis for Payment Change** filed by Freedom Mortgage Corporation at Document No. \_\_\_\_, for Claim No. 13, in this case and hereby declare that to the best of my knowledge, information and belief, the existing Chapter 13 Plan is sufficient to fund the Plan with the modified debt payment of \$1,208.05, as Debtor has been paying \$1,212.00 a month, and the plan covers the new payment.

Dated: November 1, 2021 /s/ Theresa C. Homady

Theresa C. Homady, Esquire 104 S. Center St., Ste 212 Ebensburg, PA 15931

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PA Supreme Court ID No. 47042